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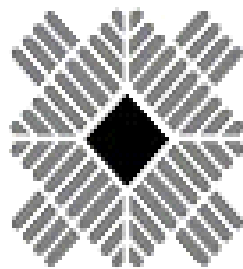
PL Sum. J.

Ex. 019

Forrest Castille

Date: October 22, 2021
Case: W.K., et al v. Red Roof Inns, et al
No.: 1:20-cv-5263-MHC

Reported by: Kelly D'Amico



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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P.,
M.B., D.P., A.F., C.A.,
R.K., K.P. and T.H.,

Plaintiffs,

vs.

RED ROOF INNS, INC., FMW
RRI NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC.,
and RRI III, LLC,

Defendants.

J.A.,

Plaintiffs,

vs.

RED ROOF INNS., INC., RED
ROOF FRANCHISING, LLC and
VARAHI HOTEL, LLC,

Defendants.

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

CIVIL ACTION FILE

NO. 1:21-cv-03655-TWT

VIDEOTAPED DEPOSITION OF FORREST CASTILLE
october 22, 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JANE DOE 1, JANE DOE 2,
JANE DOE 3 and JANE DOE 4,

Plaintiffs,

vs.

WESTMONT HOSPITALITY
GROUP, INC., RED ROOF INNS,
INC.; FMW RRI NC, LLC, RED
ROOF FRANCHISING, LLC, RRI
WEST MANAGEMENT, LLC and
VARAHI HOTEL, LLC and RRI
III, LLC,

Defendants.

E.F.,

Plaintiff,

vs.

RED ROOF INNS., INC., RED
ROOF FRANCHISING, LLC, HJA
ENTERPRISES, INC., and SAI
NATIONAL HOSPITALITY
VENTURES, LLC,

Defendants.

CIVIL ACTION FILE

NO. 1:21-cv-04278-WMR

CIVIL ACTION FILE

NO. 1:20-CV-04373-SDG

VIDEOTAPED DEPOSITION OF FORREST CASTILLE
October 22, 2021

A P P E A R A N C E S

On behalf of Plaintiffs W.K., E.H., M.M., R.P., M.B., D.P., A.F., C.A., R.K., K.P. and T.H.; Plaintiff J.A.; Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe 4; and Plaintiff E.F.:

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Videographer:

Eric Lucas

Also present:

Kristina Iakounina

- - -

1 A okay.

2 Q -- and take a break.

3 A okay.

4 Q It is a very easy thing too also for me
5 to ask the question and you think, oh, I've got the
6 answer and you're going to start talking. So just so
7 the court reporter can take it down, try to let me
8 finish the question and then -- or the other attorney
9 that might be asking and then answer the -- answer,
10 okay?

11 A okay.

12 Q And some of the other attorneys may have
13 some questions. All right?

14 A (Nods head up and down.)

15 Q okay. So just tell me when -- did you
16 work for Red Roof?

17 A I worked for Red Roof Inns from 2008
18 until 2016.

19 Q okay. And was that here in Atlanta?

20 A Uh-huh (affirmative), off of windy Hill
21 Road.

22 Q okay. And was that the -- your first job
23 when you came to Atlanta or had you been --

24 A It was. That was my first job when I
25 came to Atlanta.

1 what you observed when you were working there during
2 those four years as far as crime.

3 A It was always a high-crime area, always
4 something going on in that area with -- but it wasn't
5 as bad, but it was always something going on. People
6 always sold drugs, people always -- prostitution. It
7 was always something going on.

8 Q Okay. And when you say "that area,"
9 you're talking specifically the hotel?

10 A That windy Hill area and that hotel.

11 Q Okay. And so tell me, did you actually
12 observe yourself what you believed to be prostitutes?

13 A I did.

14 Q And why do you think they were
15 prostitutes?

16 A Because I got to know them. Like I said,
17 I was there from first to second shift and there was
18 always somebody walking and somebody coming in to
19 drink coffee, maybe they wanted change. You know what
20 I mean? And it was so -- I was so familiar with the
21 people there because, like I said, they came in and
22 talked to me and they would be -- and I would either
23 smoke with them or, you know, just laugh and talk
24 about the day. So I was very much aware of what was
25 going on, who was there and the reason they was there.

1 whether they were pimps or prostitutes or if they were
2 salesmen, I basically knew.

3 Q Okay. So tell me -- you said pimps.
4 Tell me about that. What -- did you see pimps there?

5 A Uh-huh (affirmative). They would tell me
6 what they were -- they would tell me they were pimps.
7 You know, I would know what they were doing. They
8 would tell me personally. You know, the pimps would
9 tell me, the girls would tell me and I just knew. I
10 knew what it was because they would tell me what they
11 were doing.

12 Q So tell me about what -- well, tell me
13 this: How many -- during this time period on average,
14 like how many pimps were at this hotel?

15 A 8 to 10, maybe 15 to 20 girls. It was
16 always someone there. It was always someone there
17 pimping, prostituting, selling drugs.

18 Q Okay. And the pimps, how many girls did
19 they have working for them?

20 A It all depends. Some of them have up to
21 about four, some of them would just have one girl, two
22 girls. It just all depends, you know what I mean, how
23 long they could keep them under subjection. It
24 depends on how many they had and how popular of a pimp
25 they were, if they were the man.

1 Q So you said "subjection." So tell me
2 about that. Like, what do you mean by that? What did
3 the pimps do with the people that --

4 A They controlled their whole lives, some
5 of them their whole lives, especially the young girls.
6 They -- like I said, they would feed them when they
7 got ready, they would advise them to do things when
8 they got ready. And this was personally told to me.
9 They would -- and like I said, they controlled the
10 money. They always had the money.

11 The pimps always paid for the rooms. It
12 was -- the girls really didn't pay for the rooms
13 unless they were independent girls, they didn't have a
14 pimp. But the pimps paid for the rooms. They
15 should -- they would -- I guess they -- well, they fed
16 them when they got ready, some of them. It all just
17 depends on -- they were in control of every single
18 aspect of that girl's life.

19 Q And did they get the money from what the
20 girls did?

21 A The girls always gave them the money.
22 The girls, they would have to ask them for their
23 money.

24 Q So just explain to me how the -- kind of
25 pimps and girls. Like, how did it work? How did --

1 how did -- what did you observe and how did this whole
2 thing work?

3 MR. KEITH: Objection.

4 MR. ALLUSHI: Same objection.

5 BY MR. McDONOUGH:

6 Q Okay. Just you had mentioned pimps and
7 that they had controlled 20 to 30 girls. Tell me what
8 you observed.

9 A The -- there was like a system. Like if
10 the girls -- like if they were waiting on their dates,
11 the johns or the buyers or whatever you want to call
12 them, they would call them to the hotel, but they
13 wouldn't give them their room number until they got
14 there. And like the pimps would all be all outside on
15 the balconies and they would check them out, you know
16 what I mean, and then they would give them the room
17 number to go in them.

18 Q Okay. Into the rooms?

19 A Into the rooms, uh-huh (affirmative).

20 Q And how like --

21 A Because I was out smoking.

22 Q How often was this going on?

23 A It happened from the time -- all day, all
24 night. It just depends on -- it never was a set time.
25 It was continuously happening -- happening.

1 buyers coming in and out of the room?

2 A Uh-huh (affirmative). You could -- it
3 was obvious, you know what I mean, because they had
4 time limits. They were on time limits. They might be
5 there for \$30 -- I mean, for 30 minutes, they might be
6 there for an hour. Some of them sometimes they would
7 date you for hours. It just depends on how much money
8 was involved, and I learned this from a lot of the
9 girls and the -- and the pimps.

10 Q Okay. So did you know the pimps?

11 A Uh-huh (affirmative).

12 Q Okay. And what did you learn from the
13 pimps?

14 A Pretty much to be quiet, mind my own
15 business. Because they were in control of those girls
16 and they -- some of them people -- and all of them
17 were not nice people anyway, you know what I mean.
18 Some of them would do some awful things to those girls
19 to keep them where they needed to keep them mentally.

20 Q And did you witness any of that?

21 A Oh, I've seen them get beat, I've seen
22 them lock them out of the rooms.

23 Q Tell me a little bit more about that when
24 you saw them get beat. Tell me about it.

25 A They would beat them. I've seen them

1 MR. ALLUSHI: Objection to form.

2 BY MR. McDONOUGH:

3 Q Did you see -- let me rephrase that.

4 Did you see young girls that were being
5 controlled by these pimps you described?

6 A Some of them I knew personally that were
7 being controlled and they were underage.

8 Q Like what age?

9 A 17. Like I said, 17, 16.

10 Q And throughout this entire time did you
11 see young girls like that?

12 A Uh-huh (affirmative), the whole time. It
13 never changed. It never stopped. It never stopped
14 from corporate to the franchise.

15 Q And so you were renting rooms to these
16 pimps?

17 A Uh-huh, uh-huh (affirmative).

18 Q And you knew they were pimps?

19 A Uh-huh (affirmative).

20 Q All right. And were you renting rooms to
21 other criminals?

22 A Uh-huh (affirmative).

23 MR. TONGE: Make sure he says "yes."

24 A Yes. I'm sorry, yes. I'm sorry, yes.

25 I -- like I said, I was there so much. I was there

1 waffle House or Wendy's to get something to eat.

2 But they had to stay there and watch the
3 girls and watch the other pimps so the other pimps
4 wouldn't steal the girls. Because they would steal
5 girls, they would steal dates. It's very cutthroat.

6 Q And just so I understand, you said
7 there's -- I don't know -- 10 pimps, 10 to 20 girls at
8 times so -- and they're seeing ten johns or buyers a
9 day. So --

10 A It never stopped. It's not like you have
11 three shifts.

12 MR. KEITH: Object.

13 BY MR. McDONOUGH:

14 Q Tell me how many buyers you saw coming in
15 on average.

16 A It all depended on -- it all depends.
17 10, 15, 20. It just all depended on how the money was
18 going, how much money they were making.

19 Q Not just individual. I mean the whole
20 hotel for one day. What was like the amount of buyers
21 that were coming in a day?

22 A Sometimes it had to be over 50, 60 men a
23 day.

24 Q Okay.

25 A If you got -- because if you got 20

1 supposed to have been over Red Roof Windy Hill,
2 Kennesaw, and Druid Hills. I believe that was his
3 area. Oh, and I think Morrow. I think -- not Morrow,
4 Norcross. I was going to say that was his four or
5 five hotels that he was in charge of.

6 Q Okay. And how often did he come to the
7 Red Roof Smyrna when it was corporate?

8 A I think it would be -- I would think it
9 would be like just about every quarter. They would
10 come and inspect and make sure that the rooms were in
11 shape and they were making money or -- just a general
12 inspection. That's it. That's all he came for.

13 Q And did -- when he came was it the same
14 scene that you (overspeak) --

15 MR. ALLUSHI: Object to the form.

16 A It was the same thing.

17 MR. KEITH: Objection.

18 BY MR. McDONOUGH:

19 Q Tell me what you saw when you were with
20 him.

21 A The same thing. It was -- it wasn't on
22 such a wide scale, but it was the same thing. It was
23 never a minute that I worked at Red Roof Inn, never a
24 year I worked at Red Roof Inn that there was not
25 prostitution going on in there. There was not a time

1 when people wouldn't complain. People complained and
2 they would claim -- I would tell them to call
3 corporate or -- you know what I mean. That's all that
4 I could tell them to do.

5 And like I said, I would go to -- I went
6 to Ohio twice, but that had nothing to do with
7 pimping, prostitution. It was about scores and
8 revenue and how to make a customer feel better.

9 Q Did you go to Ohio when corporate owned
10 it or was that after it was sold?

11 A After corporate owned it.

12 Q After?

13 A Uh-huh (affirmative).

14 Q After it was sold?

15 A Uh-huh (affirmative).

16 Q Okay. So prior to it being sold, were
17 you ever trained about safety or -- while working at
18 this hotel?

19 A Huh-uh, no safety training.

20 Q Were you ever trained on sex trafficking
21 while it was corporately owned during this time?

22 A Nothing, nothing like that, nothing like
23 that. We never had a class on what to do. Because I
24 really just learned terminology -- terminology of what
25 a sex trafficker was. I always just said it was

1 rooms at windy Hill. well, we didn't rent the rooms;
2 he didn't stay there.

3 Q when you were with him and walking out,
4 were there pimps that you saw?

5 A They were always -- they always standing
6 out there. They always standing out with white
7 beaters on, T-shirts on, you know, dapping it up and
8 it just looked suspect. Like I said, it looked
9 suspect and everybody, you know what I mean -- not
10 everybody. I can't just say for everybody, but if you
11 came around enough to windy Hill, you knew what was
12 going on.

13 Q Right. And were you --

14 A It was obvious.

15 Q When you were with him, did you see other
16 minor victims?

17 MR. ALLUSHI: Objection.

18 A It was always young -- it was always
19 young girls, old girls, prostitutes, pimps, all ages,
20 all colors.

21 BY MR. McDONOUGH:

22 Q And when you were with Jay Moyer, was
23 there still high traffic of cars coming in and johns?

24 A It's still high traffic. That -- it was
25 always what it -- what it was. It was always like

1 You know, if you're walking around doing an
2 inspection, you could smell it coming out of the
3 rooms. They would sit out there and smoke it.

4 Q And what was Red Roof Inn telling you?
5 Were they telling you that you had to rent rooms or
6 were they pushing revenue?

7 MR. ALLUSHI: Objection.

8 A They never -- they never ever said
9 anything about prostitution. And most of the times
10 when you're working at a hotel it's about how many
11 beds you can sell, how many heads you can lay in the
12 bed. It's always about -- it's about revenue and
13 trying to keep the customers happy. That was the only
14 training that we had.

15 It was never about safety. It was never
16 about what should I do if a dope dealer or drug dealer
17 or prostitute, none of that. No kind of training
18 about that at all.

19 BY MR. MCDONOUGH:

20 Q Was there ever a security guard when you
21 were there?

22 A Just without a gun, just a regular
23 security guard, nothing that -- nothing that could
24 really protect nobody.

25 Q And did you interact with him or did --

1 franchise.

2 BY MR. McDONOUGH:

3 Q And so -- and did you know these pimps as
4 well?

5 A Uh-huh (affirmative). It didn't change.
6 Some of them never changed. Some of them changed,
7 some of them came back in. Basically it was the same
8 people. Sometimes it was the same people from when I
9 started until when I left doing the same thing.

10 Q And were you hanging out with them?

11 A I smoked blunts with them, I drank beer
12 with them, they had barbecues. Yes, I did.

13 Q And you rented rooms to them?

14 A I rented rooms to them.

15 Q All right. And did you witness girls
16 that were being controlled by these pimps?

17 A Yes, sir. Like I said, and I'll say
18 it -- I'll keep saying it, it was the -- nothing
19 changed but the ownership, the ownership of the Red
20 Roof Inn.

21 Q And when you --

22 A It was still the same pimping, pandering,
23 whatever you want to call it, dope selling.

24 Q And did you see girls that were -- had
25 bruises or injured?

1 blood, crack pipes, condom wrappers, just a "lube" or
2 whatever. Just whatever it takes for them to do their
3 job and for them to get high or drinking.

4 Q And did the pimps turn their cars
5 backwards so the police couldn't see their tags?

6 A And that's when sometimes the police
7 would get out and walk because everybody would be
8 parked in the -- you know, parked where you couldn't
9 see the tags. And like I said, sometimes it was
10 darker in the back and some people just preferred the
11 back because it was darker back there. It was more
12 secluded.

13 Q And so you were -- while you were working
14 for them during this time period, you would rent to
15 the pimps?

16 A They were the customers that we had.
17 They were the customer base at that time.

18 Q And tell me like what's the -- just
19 ballpark, how much customer base was it during this
20 time frame?

21 A I would still say 50 -- it was really
22 50/50 then, like I said, during -- because sometimes
23 during the slow season -- the slow season is between
24 November -- like Thanksgiving to the first of the
25 year, to January the 1st, as a matter of fact, or New

1 A No more than their system, how to use the
2 system.

3 Q what do you mean, "their system?"

4 A Their computer system.

5 Q Checking --

6 A Like there's different brands. Different
7 chains have different computer systems they use.

8 Q Did you receive any training on safety
9 and security?

10 A Never.

11 Q Did you receive any training on
12 prostitution?

13 A Never.

14 MR. ALLUSHI: Can I have some exhibit
15 stickers?

16 (Thereupon, an off-the-record discussion
17 was held.)

18 MR. McDONOUGH: Do you just want to keep
19 it marked as what it was before? Is that the
20 same one?

21 MR. ALLUSHI: well, it's the same one
22 from Vanessa Cole's deposition. Do you want me
23 to just refer to it as 1 or should we --

24 MR. TONGE: Yeah, let's just use the
25 same.

1 report -- did you ever call the police to report any
2 criminal activity at all at the Red Roof while you --

3 A Maybe if they got to fighting or
4 something, or something like that, but I wouldn't just
5 call the police for -- telling them, oh, we got
6 prostitution in here. I never did that.

7 Q why not?

8 A Look, it was going on before I got there
9 and it was going on after I left. I was not there to
10 police the Red Roof Inn. I was there to get a
11 paycheck every other Friday. That was my main
12 concern. It's the way I had to maintain and the way I
13 had to live. I was not the prostitute police or the
14 pimp police.

15 Q How do you know it was going on before
16 you got there?

17 A Because the same people, they had been
18 coming for years. They had told me they had already
19 been coming.

20 Q And how do you know --

21 A They told me they were already guests.
22 They told me they had been coming to this Red Roof
23 Inn. This is where they came.

24 Q And how do you know that it was occurring
25 after you left?

1 for, you know, people fighting?

2 A I said that. I've already said that. I
3 did.

4 Q But you wouldn't call the police to
5 report prostitution?

6 A why would it be my job to call and report
7 something that has been happening repeatedly year
8 after year? why -- why would I do that? It wouldn't
9 change anything, it wouldn't stop anything.

10 Q It wasn't your job to make sure that the
11 hotel was safe and secure?

12 A It was my job to make sure that I was
13 most safe and secure than anybody. I came before that
14 hotel and my safety came before the hotel.

15 (Interrupting noise in the proceedings.)

16 MR. KEITH: Somebody is here.

17 BY MR. ALLUSHI:

18 Q Do you know if anybody else that worked
19 with you at the time called the police to report
20 criminal activity?

21 A Nobody that -- nobody that I really know.
22 I can't say they called the police or -- if they did,
23 that was on their shift and maybe something happened
24 on that shift, but everything else that was going on
25 it was so rampant and everybody knew from -- from the

1 higher-ups. We were the low -- we were low on the
2 totem pole. And, like I said, everybody was just
3 trying to make ends meet.

4 Q Did you report the prostitution and
5 alleged criminal activity to your supervisor?

6 A Say the right -- say -- I'm trying to
7 figure out the right way to say it. Because they knew
8 prostitution was there. I didn't have to report what
9 was already known.

10 Q I'm asking, did you report the alleged
11 prostitution and --

12 A We talked. We talked about it and
13 everybody knew each time. Each corporate or franchise
14 knew that there was prostitution going on.

15 Q You told me --

16 A So you didn't have to keep reporting
17 what's already going on if it happened repeatedly. So
18 every day I'm supposed to say there's a prostitute
19 here, there's a prostitute here, these are prostitutes
20 right here and some repeat prostitutes or repeat
21 customers. So I didn't feel the need, but I had to
22 really be overly concerned about reporting stuff. I
23 did what I could do to help some of those young
24 ladies, but as far as me being a safety -- the police
25 or security guard, no.

1 familiar with the pimps and the girls.

2 Q And if you knew they were pimps, why
3 would you give them rooms?

4 A They had been given to them. why would I
5 not?

6 Q Do you have -- do you have an answer to
7 my question?

8 A I said nobody told me not to rent to
9 them. And they knew they were pimps, they knew they
10 were prostitutes. The management didn't tell me not
11 to rent to them.

12 MR. KEITH: Objection.

13 BY MR. ALLUSHI:

14 Q Mr. Castille, you knew that these -- the
15 pimps were illegally in the property.

16 A I --

17 Q why did you -- why did you give them
18 rooms?

19 MS. HOYING: Objection.

20 A Hold on. First of all, I'm not a
21 policeman. I didn't work for the police department.
22 It is not my business to control illegal activ- --
23 activity and moral activities. That was not my job.
24 My job was to check them in, greet them, make sure
25 they paid their money; but my job was not going around

1 saying, oh, you're a pimp, you can't stay at the Red
2 Roof Inn. Nobody else told them they couldn't stay.

3 BY MR. ALLUSHI:

4 Q And the same question for the prostit- --
5 for the prostitutes, the alleged prostitutes. You
6 knew they were prostitutes; correct?

7 A Of course. And like I said --

8 Q And why would you check them in?

9 A Like I said, it was not my job to
10 basically -- checking them in on their work history or
11 their job description.

12 Q So your understanding of your job was
13 just to check people in and not worry about --

14 A And make sure everything else --

15 Q Let me finish my question.

16 A Okay.

17 Q -- and not be aware or be alert of any
18 criminal activity?

19 MS. HOYING: Objection.

20 A Sir, it was not my job to police the
21 hotel. You can ask this question about the pimps and
22 the prostitutes, but it was not my job. That wasn't
23 my job to do. You can ask this a thousand times.

24 I don't remember seeing this paper about
25 nothing. And like I said, most of the time people

1 Q So you're saying [REDACTED] is lying?

2 A She's lying, and I'd tell her in her face
3 she's lying.

4 Q Did they give you any weed? Did Mario
5 give you weed?

6 A I bought weed from them and they gave me
7 weed and we smoked weed.

8 Q So you purchased weed from him; he also
9 gave you free weed?

10 A Yeah, we smoked together, he gave it to
11 me.

12 Q Okay. You were testifying earlier, you
13 said that you got fired from the Red Roof Inn
14 Smyrna --

15 A Uh-huh (affirmative).

16 Q -- when Varahi was the franchisee for
17 speaking to the -- to a newspaper; right?

18 A Uh-huh (affirmative).

19 Q And you stated that you had told this
20 newspaper that you were trying to clean up the hotel;
21 is that correct?

22 A Not that I was trying to. They were --
23 that we were taking steps or that Red Roof Inn was
24 taking steps to try to make things better because it
25 was -- it was known what was going on.

1 Q You smoked weed with them?

2 A Uh-huh (affirmative).

3 Q They gave you weed?

4 A They didn't really give me a whole lot of
5 weed. We smoked weed together. I bought weed from
6 them, but...

7 Q And you also wanted to have sex with
8 them?

9 A Hmmm? No, I said I would have, but no, I
10 didn't want to have sex with them. But I would have
11 if the opportunity presented itself perhaps.
12 (Overspeak.)

13 Q But you never took any money from them?

14 A No, they didn't give me any money.

15 Q You never served as a lookout?

16 A Never was a lookout.

17 Q You also testified earlier, Mr. Castille,
18 that back during your employment there the term "sex
19 trafficking" wasn't familiar to you; correct?

20 A Not at all.

21 Q So did you back then think that the girls
22 were just prostitutes?

23 A That's all I knew about, prostitution.

24 Q And when was the first time you
25 familiarized yourself with sex trafficking, the actual

C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported, as stated in the caption; that the witness was duly sworn and elected to reserve signature in this matter; that the colloquies, questions and answers were reduced to writing under my direction; and that the foregoing pages 1 through 244 represent a true, correct, and complete record of the evidence given.

I further certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); that I am a Georgia Certified Court Reporter here as a representative of D'Amico & Associates; that I/D'Amico & Associates was contacted by the party taking the deposition to provide court reporting services for this deposition; that I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 10.B of the Rules and Regulations of the Board; and by the attached disclosure forms I confirm that I/D'Amico & Associates is not a party to a contract prohibited by O.C.G.A. 15-14-37 (a) or (b).

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of D'Amico & Associates and the signature and original seal is attached thereto.

This, the 1st day of November, 2021



KELLY D'AMICO, RPR, CCR-B-1322

